

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

Respondent: Lawrence R. Craft

Title: Manager

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-1 Please refer to page 2 of Verizon's Panel Testimony where it references the currently available collocation arrangements and the applicable security measures for central offices and other collocated facilities. (a) Please provide a list that identifies by location each of the Verizon-MA' central offices and the specific types of collocations that exist in each of those central offices; (b) For each of these central office locations, please indicate whether such office is equipped with (i) surveillance cameras; (ii) electronic card readers; (iii) whether badges with computerized tracking systems have been issued to persons having access to such central offices. If badges with computerized tracking have been issued, please indicate the number of badges that have been issued to Verizon employees and the number of badges that have been issued to CLECs in Massachusetts.

REPLY:

- a) See attached.
- b)
 - i. See Attached for a list of Massachusetts COs equipped with closed circuit television systems for collocation areas. This list does not include COs where security cameras may be used for non-collocation areas.
 - ii. See Verizon MA's Reply to Qwest 1-20
 - iii. Verizon MA issues ID cards and access cards, not badges with computerized tracking.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft

Title: Manager

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-2 Please identify and provide a copy of Verizon-MA's existing collocation security policy or policies.

REPLY: See attachments to Verizon MA's Replies to Allegiance 1-1(c) and 1-2.

VZ # 101

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft
Title: Manager

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-3 Does Verizon-MA's security policy permit CLECs to install their own video surveillance equipment in the space that they lease from Verizon-MA to monitor their equipment in Verizon-MA's central offices? Please identify where in Verizon-MA's security policies it states that CLECs are not permitted to install their own video surveillance equipment to protect their collocated equipment.

REPLY: Yes. A CLEC can install either an overt or covert video surveillance system in its collocation space provided that the images recorded or transmitted are limited to the specific CLEC's equipment or operating area, and do not include images of other CLEC or Verizon areas or equipment.

VZ # 102

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-4 Please refer to page 3, line 17, of Verizon's Panel Testimony where it states that "the most effective means of insuring network safety and liability is to eliminate physical collocation entirely in all of its COs, converting existing physical collocation arrangements to virtual and requiring that all future collocation arrangements be virtual only." Please answer the following questions:

- a. Please provide a list of central offices in which Verizon has established separate space for collocating carriers;
- b. Please provide a list of all central offices that have separate entrances for collocating carriers;
- c. Please identify all instances where a collocating carrier's actions were responsible for a Verizon network outage within the central office;
- d. Please identify all instances where a Verizon-MA technician's actions were responsible for a network outage within the central office;
- e. What proposal is Verizon making to protect CLEC equipment from Verizon employees?
- f. What proposal is Verizon making to protect CLEC equipment from terrorists?

REPLY:

- a. See Verizon MA's Reply to Qwest 1-11.
- b. See Verizon MA's Reply to Qwest 1-11.
- c. See Verizon MA's Reply to Qwest 1-5
- d. See Verizon MA's Reply to Qwest 1-5.
- e. Verizon's current collocation offerings provide considerable protection for CLEC equipment. CLECs can enclose their arrangements in wire mesh caging, install cabinets around SCOPE and CCOE arrangements, and install surveillance cameras.

REPLY: Conversent 1-4 f. See Verizon MA's Reply to Qwest 1-3.
(cont'd)

VZ # 103

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-5 Does Verizon-MA keep logs that reflect access to each collocation arrangements by Verizon employees, Verizon vendors and CLEC employees? If it does not, why doesn't Verizon-MA keep logs?

REPLY: Verizon MA does not keep logs of access to each collocation arrangement by Verizon employees, Verizon Vendors or CLEC employees.

Verizon does not maintain such logs because, other than in an emergency situation and in accordance with the tariff, Verizon employees and contractors do not access CLEC collocation arrangements. Verizon has no interest and sees no benefit to logging individual CLEC access to the CLEC's own collocation arrangements.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-6 Please refer to page 4, line 5 through page 5, line 4 of the Verizon Panel Testimony where Verizon proposes certain proactive collocation security measures it believes should be adopted based on the potential for network harm and Verizon's experience with security breaches in Massachusetts and elsewhere and answer the following questions:

- a. Please provide a list of the Verizon-MA central offices that have a collocating carrier's equipment co-mingled with Verizon equipment;
- b. Please provide a list of Verizon-MA central offices that Verizon intends to identify as "high" security risk central offices and therefore subject to "virtual collocation only" sites;
- c. Please provide a list of all Verizon-MA central offices in which Verizon proposes to require an escort.

REPLY:

- a) See Verizon MA's Reply to Allegiance 1-9.
- b) See Verizon MA's Reply to XO-VZ 1-4.
- c) Verizon MA's interconnection tariff (DTE MA No. 17) currently requires, for any central office (CO), escorts to accompany CLEC representatives for all manhole and vault locations (Part E, Section 2.2.2 F). Pursuant to its tariff, Verizon MA may also require escorts when CLECs require access to areas other than where their collocated equipment is located, during construction of the CLEC's collocation space or where security measures are not yet in place (Part E, Section 2.2.5). Escorts are also required in Massachusetts during CO

REPLY: Conversent 1-6
(cont'd)

tours conducted where sufficient space is not available to accommodate a CLEC's request for physical collocation (Part E, Section 2.4.2) and may be required when CLECs request access to shared facilities, such as loading docks, freight elevators, temporary staging areas. See Verizon MA's Replies to Allegiance 1-1 and Qwest 1-43. Verizon MA proposes no change in these requirements.

VZ # 105

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft
Title: Manager

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-7 Please refer to page 5, line 8 of the Verizon Panel Testimony in which it states that Verizon-MA plans to implement an in-depth, prescreening of colocated carrier personnel.

- a. Please provide the current screening requirements for issuing a Verizon badge to CLEC employees;
- b. Please provide the current screening procedures for issuing a Verizon badge to Verizon employees;
- c. Verizon badge to Verizon vendors.

REPLY: See Verizon MA's Reply to Allegiance 1-2 (a).

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft
Title: Manager

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-8 Please refer to page 6, line 1 of the Verizon Panel Testimony where it states that "strengthened security procedures will also reduce the degree of risk to Verizon-MA's facilities."

- a. What security measures has Verizon-MA implemented to prevent the theft or harm of CLEC equipment in Verizon-MA's central offices?

REPLY: Depending on the requirements of the specific Central Office, a number of physical security measures are implemented. Standards for all locations include Verizon issued identification cards and either keyed or electronic access controlled access, as well as guard controlled access at certain buildings. However, as previously stated in Verizon MA's Panel Testimony, while these and other security measures provide a degree of security, they can – and should be – enhanced. The recommendations provided by Verizon MA in its Panel Testimony are intended to provide the level of security required for both CLEC and Verizon personnel and equipment. This may also include enhancements that CLECs choose to implement, such as ordering cage tops, their own surveillance and monitoring systems for their space (e.g., alarms, motion detection security video) and tightened control over keys and access cards issued by Verizon MA.

See also Verizon MA's Reply to Conversent 1-4e

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera
Title: Director

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-9 Please refer to page 10, lines 13-15 of the Verizon-MA's Panel Testimony where it states that "CCOE arrangements may not require the construction of a separate collocation area, *e.g.*, a separate room or isolated space segregated from Verizon's own network equipment." Please identify the CCOE arrangements that are not located in a secure separate space within Verizon's CO premises.

REPLY: See Verizon MA's Reply to Allegiance 1-9.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney
Title: Director

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-10 Please refer to page 11, line 4 of the Verizon Panel Testimony where it describes that for purposes of virtual collocation, "the CLEC leases its equipment to Verizon-MA to install, maintain, upgrade and repair on Verizon's premises under the direction - and for the benefit - of the CLEC."

- a. Who is responsible for training the Verizon central office technicians on the equipment used by CLECs?
- b. Please provide a copy of all documents and policies that are used to train such technicians about the equipment used by CLECs.
- c. Of the four-(4) virtual collocation arrangements used in Massachusetts, how many are utilized due to space limitations?

REPLY:

- a) In accordance with Part E Section 3.3.3 of Verizon MA's DTE 17 tariff, the CLEC is responsible for providing training for the Verizon technicians.
- b) The documentation and policies that are used to train technicians about the equipment is provided by the CLEC. This third-party data should be obtained directly from the CLEC.
- c) All five virtual collocation arrangements in Massachusetts were installed due to space constraints at the time the arrangements were requested. See attachment to Conversent 1-1a

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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft
Title: Manager

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-11 Please refer to page 13, line 3 of the Verizon Panel Testimony where it references the current security measures that are set forth in 47 C.F.R. § 51.323(i).

- a. Please provide a list of central offices in which Verizon-MA has deployed the use of badges with computerized tracking systems;
- b. Please provide a list of collocating carriers that have been issued badges with computerized tracking systems;
- c. Please provide the number of Verizon-MA employees and vendors that have been issued badges with computerized tracking systems;
- d. Please define how Verizon-MA's electronic card reader system is similar to or different from the systems being used by other ILECs.
- e. Please provide the method that Verizon-MA uses to pre-screen employees, vendors and collocating carriers before issuing a badge with computerized tracking;
- f. Please provide all written materials that reflect the methods that Verizon-MA uses for such purposes;
- g. Please provide all documentation used in training Verizon-MA employees on collocation security, and the number of employees that have been provided that training;
- h. For each of Verizon-MA's central offices, please identify the security measures that are currently in place;
- i. Please provide a list of the approved Verizon-MA vendors that have access to its central offices in Massachusetts;

REPLY: a) Verizon MA does not issue or use badges with computerized systems.

- REPLY: Conversent 1-11**
- b) See Verizon MA's Reply to (a) above.
 - c) See Verizon MA's Reply to (a) above.
 - d) Verizon MA does not have specific knowledge of the particular electronic access hardware and software used by other incumbent LECs.
 - e) See Verizon MA's Reply to Allegiance 1-2 a
 - f) See (e) above. .
 - g) All Verizon technicians are required to follow Verizon's Installation Practice and Industry Standards (Information Publication - IP-72201). These procedures are voluminous, as stated in Verizon MA's Reply to Qwest 1-40, and are available on Verizon's Wholesale Website (CLEC Handbook, Vol. 3):
<http://128.11.40.241/east/wholesale/resources/pdf/ip72201.pdf>
See Verizon MA's Reply to Allegiance 1-1g for the number of central office employees.
 - h) See Verizon MA's Reply to Allegiance 1-1(c).
 - i) See Verizon MA's Reply to Qwest 1-37...

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft
Title: Manager

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-12 Please refer to page 19, line 4 of the Verizon Panel testimony where it states that "*the use of cameras alone* is neither an effective nor efficient proactive security method." Please admit or deny that real-time monitoring through the use of camera surveillance would improve security in central offices. Please identify any documents or studies that indicate that the use of such cameras would not improve security in ILEC central offices.

REPLY: Even real-time monitoring through the use of camera surveillance will not necessarily improve security in the central offices because not all activity can be captured due to the physical configuration of equipment and space in those locations. Therefore, while real-time monitoring may act as a deterrent for some individuals, it will not necessarily prevent actual security violations. The most effective security measure is to restrict access by non-Verizon personnel to certain parts of the CO (*e.g.*, outside the designated collocation areas) or, in the case of critical COs, allow no access at all.

See Verizon MA's Reply to Allegiance 1-26 for requested documentation.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney
Title: Director

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-13 Please refer to page 14, lines 10 through 12 of the Verizon Panel Testimony where it states that "Verizon may provide escorts, at no cost to CLECs, prior to implementation of permanent security measures at a CO." Over the past 12 months, how many such escorts were provided to CLECs?

REPLY: The requested information is not available.

VZ # 112

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft
Title: Manager

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-14 Please refer to page 20, line 14 of the Verizon Panel Testimony where it states that there have been incidents where collocating carriers have not reported lost access cards and that CLEC personnel or agents have used access cards belonging to others.

- a. Please provide the documentation that supports this claim;
- b. Is Verizon aware of instances in which Verizon employees have not reported lost access cards or returned cards given to former employees and representatives?
- c. Please identify whether Verizon is aware of its own employees, agents or vendors using cards belonging to others;
- d. How many Verizon employees have been disciplined for failing to display an identification badge in the last 12 months in Massachusetts

REPLY:

- a) See Verizon MA's Reply to Allegiance 1-6 and AG 1-1.
- b) Yes.
- c) Yes.
- d) The requested information is not available. Enforcement of this procedure is generally handled by each employee's local supervision. In addition, disciplinary sanctions may vary (consist of an informal verbal warning or reminder to display the proper identification as well as more severe actions).

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

**Respondent:
Title:**

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-15 NO QUESTION

REPLY:

VZ # 114

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

Respondent: Lynelle Reney

Title: Director

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-16 Please refer to page 26, line 7 of the Verizon Panel Testimony where it references critical central offices such as those with tandem switches or Signal Transfer Points ("STP").

- a. Please provide a list of central offices with tandem switches;
- b. Please provide a list of central offices with STPs;
- c. Please provide a copy of Verizon's collocation guidelines issued in June 2000.

REPLY:

- a. See Verizon MA's Reply to XO Communications 1-4.
- b. See Verizon MA's Reply to XO Communications 1-4.
- c. See Verizon MA's Reply to Allegiance 1-1.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft

Title: Manager

Respondent: Robert D. Jacobs

Title: Director

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-18 Please refer to footnote 25 on page 31 of the Verizon Panel Testimony where it states that "untrained CLEC employee/agent may accidentally damage Verizon-MA equipment while working on the CLECs equipment, or may inadvertently work on Verizon-MA's equipment in a co-mingled environment." Please identify all instances where Verizon asserts that "untrained" CLEC employees or agents have accidentally damaged Verizon-MA's equipment while working on the CLECs equipment, or inadvertently worked on Verizon-MA equipment in a co-mingled environment. Please provide the date and location for each such instance.

REPLY: See Verizon MA's Reply to Attorney General 1-1

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft

Title: Manager

Respondent: Robert D. Jacobs

Title: Director

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-19 Please refer to footnote 26 on pages 31 and 32 of the Verizon Panel Testimony where it states that to "the extent that CLEC and Verizon equipment may be the same, this also increases the likelihood that "spare parts" on hand in Verizon CO will be "poached" if needed by a collocated carrier for provisioning or maintenance purposes, based on Verizon's actual experience nationwide in physically collocated COs." Please provide all instances in which Verizon has documented that spare parts in a Verizon central office in Massachusetts has been poached by a collocated carrier. Please provide the dates and locations of such instances. Please also provide all service outages that Verizon has experienced in Massachusetts when a CLEC has allegedly borrowed, "in-use" Verizon equipment parts for their own needs, without Verizon's permission or prior knowledge.

REPLY: See Verizon MA's Replies to Attorney General 1-1 and Qwest 1-5.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd
Title: Director

REQUEST: Conversent Communications of Massachusetts, Set #1

DATED: April 23, 2002

ITEM: Conversent 1-20 Please refer to page 30 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has not determined the costs associated with its proposed collocation security plan."

- a. Please provide the costs associated with each of Conversent's 54 collocation arrangements to implement Verizon-MA's proposed collocation security plan.
- b. For each of Conversent's 54 collocation arrangements, please indicate which of such arrangements do not provide for a separate and secure space, segregated from Verizon-Ma's own network equipment.

REPLY:

- a. See Verizon MA's Reply to XO Communications 1-4.
- b. The only Massachusetts Central Office where existing physical collocation arrangements are not located in separate and secure space is identified in Verizon MA's Reply to Allegiance 1-9.